

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NELSON FIGUEROA,

Defendant.

INDICTMENT

CASE NO.

**1 16 CR 081**Title 21, Section 843(b), United  
States Code**JUDGE ADAMS**COUNTS 1-13

The Grand Jury charges:

On or about the following dates, in the Northern District of Ohio and elsewhere, defendant, NELSON FIGUEROA, did knowingly and intentionally use any communication facility, to wit: the United States Mail, to facilitate acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is Distribution of Cocaine and Conspiracy to Distribute Cocaine, a Schedule II controlled substance:

Count	Mailing Date	USPS Parcel Number	Contents
1	July 5, 2015	9505 5110 9821 5186 6656 01	\$32,000
2	July 5, 2015	9505 5110 9821 5186 6645 12	\$32,000
3	July 5, 2015	9505 5110 9821 5186 6649 32	\$32,000
4	July 28, 2015	9505 5110 9888 5209 8311 93	\$33,000
5	July 28, 2015	9505 5110 9888 5209 8318 10	\$33,020
6	July 29, 2015	9505 5110 9821 5210 7512 18	\$31,350
7	July 29, 2015	9505 5110 9821 5210 7508 46	\$32,820
8	July 29, 2015	9505 5110 9821 5210 7521 92	\$32,800
9	July 29, 2015	9505 5110 9821 5210 7526 97	\$33,000
10	August 3, 2015	9505 5110 9821 5215 8260 89	\$32,740
11	August 3, 2015	9505 5110 9821 5215 8248 25	\$40,020
12	August 3, 2015	9505 5110 9821 5215 8257 09	\$60,000
13	August 3, 2015	9505 5110 9821 5215 8243 99	\$32,020

In violation of Title 21, Section 843(b), United States Code.

**FORFEITURE: 21 U.S.C. § 853**

The Grand Jury further charges:

The allegations contained in Counts 1-13 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853. As a result of these offenses, defendant NELSON FIGUEROA shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violations; and, any and all of the defendant's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; including, but not limited to, the following:

- a.) \$33,000.00 in U.S. Currency mailed on July 28, 2015, in USPS Parcel Number 9505 5110 9888 5209 8311 93.
- b.) \$33,020.00 in U.S. Currency mailed on July 28, 2015, in USPS Parcel Number 9505 5110 9888 5209 8318 10.
- c.) \$31,350.00 in U.S. Currency mailed on July 29, 2015, in USPS Parcel Number 9505 5110 9821 5210 7512 18.
- d.) \$32,820.00 in U.S. Currency mailed on July 29, 2015, in USPS Parcel Number 9505 5110 9821 5210 7508 46.
- e.) \$32,800.00 in U.S. Currency mailed on July 29, 2015, in USPS Parcel Number 9505 5110 9821 5210 7521 92.
- f.) \$33,000.00 in U.S. Currency mailed on July 29, 2015, in USPS Parcel Number 9505 5110 9821 5210 7526 97.
- g.) \$32,740.00 in U.S. Currency mailed on August 3, 2015, in USPS Parcel Number 9505 5110 9821 5215 8260 89.

h.) \$40,020.00 in U.S. Currency mailed on August 3, 2015, in USPS Parcel Number 9505 5110 9821 5215 8248 25.

i.) \$60,000.00 in U.S. Currency mailed on August 3, 2015, in USPS Parcel Number 9505 5110 9821 5215 8257 09.

j.) \$32,020.00 in U.S. Currency mailed on August 3, 2015, in USPS Parcel Number 9505 5110 9821 5215 8243 99.

k.) MONEY JUDGMENT: The defendant shall forfeit property, including, but not limited to, a sum of money equal to the proceeds of such violations.

#### **SUBSTITUTE PROPERTY**

In the event that any property subject to forfeiture under 21 U.S.C. § 853, as a result of any act or omission of the defendant:

- a.) cannot be located upon exercise of due diligence;
- b.) has been transferred or sold to, or deposited with a third party;
- c.) has been placed beyond the jurisdiction of this Court;
- d.) has been substantially diminished in value; or,
- e.) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant, up to an amount equivalent to the value of the forfeitable property described above.

**A TRUE BILL.**

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.